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August 19, 1999

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Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
Portals II
445 12th Street, SW.
Suite TW-A325
Washington DC 20554

Re: File No. NSD-L-99-24, CC Docket 92-105

Dear Ms. Salas:

The Metropolitan Transportation Commission (MTC) is encouraged to see the strong show of support from around the nation for the U.S. Department of Transportation's petition to the Federal Communications Commission (FCC) for assignment of a nationwide standard abbreviated dialing number (N11) for traveler information purposes. As stated in our initial comments, MTC supports the U.S. DOT's petition, and urges favorable and timely consideration by the FCC. We would like to take this opportunity to respond to some suggestions and criticisms raised by other commenters to the petition.

MTC agrees with the recommendation in the comments jointly submitted by the Intelligent Transportation Society of America (ITSA), the American Public Transit Association (APTA), and the American Association of State Highway and Transportation Officials (AASHTO) that implementation issues are best addressed by state and local authorities after N11 assignment occurs.¹ We recognize that implementation concerns are important, but agree that they should be resolved prior to operation, not assignment, of an abbreviated dialing number. However, the Southern California Association of Governments (SCAG) has raised questions about implementation that may appear to cast doubt on the worthiness of the petition. As an experienced program manager of a traveler information system, MTC feels compelled to comment upon some of these implementation concerns.

¹ ITSA/APTA/AASHTO, Letter to the FCC re: U.S. DOT Petition for an Abbreviated Dialing Number, July 20, 1999, p 47.

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Inter-Jurisdictional Coordination

The first issue upon which we would like to comment relates to the challenges in achieving inter-jurisdictional coordination. In its comments, SCAG states: "Simply completing an inventory of [which transportation agencies are] responsible for what and where would be extremely difficult²." In fact, this statement is a compelling reason to implement a single nation-wide 3-digit number. If a regional transportation agency such as SCAG finds it daunting to catalog the available traveler information resources, then imagine the problems each individual traveler faces when he or she wants to make a regional or inter-regional trip. The difficulty in generating an inventory and ensuring coordination is not a reason to oppose the N11 concept. MTC has already worked out inventorying and coordinating arrangements with 59 agencies in the San Francisco Bay area: this is a problem that can be solved.

Funding

Another implementation concern voiced by SCAG relates to resources – how to fund the operations underpinning the N11. As evidenced by the widespread show of support for the U.S. DOT petition by local, regional, and state transportation agencies across the nation, political support for a 3-digit transportation number has been established and will continue to grow. Metropolitan regions operating or wishing to operate traveler information systems can qualify for a variety of funding sources. We described some of the public funds available in some detail in our original comments³. The ITSA/APTA/AASHTO comments state that 299 services are already in operation throughout the nation.⁴ Clearly, appropriate funding for these systems have already been identified. Lastly, the adequacy of funding is a local implementation issue that should be unrelated to the availability of a nationwide N11 telephone number.

Staffing

The last point we would like to make relates to how regions will provide the support staff to field errant calls as users learn what services a traveler information system may actually provide. Current technology is such that voice processing systems can and do connect directly to existing transportation agency services. The decision to provide human assistance can be entirely at the discretion of each implementing region. In the Bay Area, callers reach a human operator only after they have selected a specific option related to transit or ridesharing. The recorded calls to our comment line have rarely stated that the caller was disappointed in an attempt to use the system to obtain information on far-flung transportation information issues, such as helping them get their traffic signal or their pothole fixed.⁵ While there certainly can be a learning curve for the menu system, MTC asserts that, with appropriate marketing and education, the portion of the

² SCAG, Letter to the FCC re: U.S. DOT Petition for an Abbreviated Dialing Number, June 14, 1999, p.2.

³ MTC, Letter to the FCC re: U.S. DOT Petition for an Abbreviated Dialing Number, July 17, 1999, p.5.

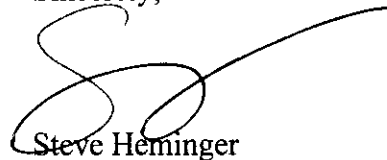
⁴ ITSA/APTA/AASHTO, Letter to the FCC re: U.S. DOT Petition for an Abbreviated Dialing Number, July 20, 1999, p 19.

⁵ SCAG, p. 1.

public who will incorrectly call the N11 to ask about issues unrelated to its purpose is likely to be negligible.

In closing, MTC understands that the N11 numbers are a scarce and valuable public resource. We believe that the allocation of an N11 number for traveler information purposes is an appropriate use of this resource. MTC also recognizes the need to address implementation concerns. It is, however, our belief that these implementation concerns can be resolved in a timely, efficient manner and should not, in any way, present an impediment to assignment of a 3-digit dialing number for transportation information. With a nationwide standard abbreviated dialing number (N11), traveler information systems can provide a consistent service, build upon each other's marketing and public information efforts to leverage a greater overall awareness and provide a new level of convenience to the traveling public.

Sincerely,

A handwritten signature in black ink, appearing to read 'Steve Heminger', with a long, sweeping horizontal line extending to the right.

Steve Heminger
Deputy Executive Director

cc: Al McCloud (2 copies), Network Services Division
Helene Schrier Nankin, Common Carrier Bureau
Mark Pisano, SCAG Executive Director